

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KEEP ON KICKING MUSIC, INC., *et al.*,
Plaintiffs,
- against -
UNIVERSAL MUSIC GROUP, INC., *et al.*,
Defendants.

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23-CV-4400 (JPO) (BCM)

**[PROPOSED]
REVISED SCHEDULING ORDER**

BARBARA MOSES, United States Magistrate Judge.

For good cause, the Court adopts the following Revised Scheduling Order and amends the Case Management Order (Dkt. No. 93) as follows:

3. Discovery with Regard to Liability.
 - b. Expert Musicology Discovery. Expert musicology evidence intended solely to contradict or rebut an opposing party's report must be served no later than **May 19, 2025**. Depositions of musicology experts shall be completed no later than **June 5, 2025**.
 - c. Depositions and Additional Fact Discovery. All remaining fact discovery, including depositions, shall be completed no later than **June 5, 2025**.
 - d. Additional Expert Discovery with Regard to Liability. As to any remaining liability topics requiring expert evidence, the parties shall disclose that evidence, including the identities and written reports of experts, as required by Fed. R. Civ. P. 26(a)(2)(A), (B), or (C), no later than **July 3, 2025**. The disclosure of expert evidence intended solely to contradict or rebut an opposing party's report shall be made no later than **July 24, 2025**. Depositions of experts shall be completed no later than **August 7, 2025**.
4. Close of Liability Discovery. All liability discovery shall be completed no later than **August 7, 2025**.
5. Summary Judgment as to Liability. The parties' motions for summary judgment with regard to liability (or, if required by the district judge, pre-motion conference letters with respect to summary judgment) shall be filed no later than **September 8, 2025**. Summary judgment motion papers shall conform to the individual practices of the district judge.

Dated: _____
New York, New York

SO ORDERED.

BARBARA MOSES
United States Magistrate Judge